

From: Laurence <ls@laurencesinger.com>
Subject: Re: Motion for Sanctions
Date: September 20, 2018 at 7:45:08 AM EDT
To: Richard Liebowitz <RL@liebowitzlawfirm.com>

Richard, from the Judge's September 17th Order:

"If defendant believes that plaintiff is in violation of the September 6 Order - for example, by failing to produce all non-privileged documents responsive to Requests No. 1-5 or by withholding documents on the basis of privilege without serving a privilege log - it may seek redress pursuant to Fed. R. Civ. P. 37(b), including sanctions pursuant to Rule 37(b)(2)(A). Any such motion must be made in compliance with Local Civil Rule 37.2 and this Court's Individual Practices."

It took one response and three amended responses for you to state "There are no privileged documents", even through the Court made very clear what was required. Please let me know your response to the Letter Motion, which sets forth the progression of these issues.

Laurence

From: Richard Liebowitz <RL@liebowitzlawfirm.com>
Subject: Re: Motion for Sanctions
Date: September 19, 2018 at 11:29:39 PM EDT
To: Laurence <ls@laurencesinger.com>

Laurence,

I don't follow. There were no privileged documents, I am not sure why this is necessary.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

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On Wed, Sep 19, 2018 at 11:16 PM Laurence <ls@laurencesinger.com> wrote:
Richard, attached is the Letter Motion requesting additional sanctions. I am sending this letter and the Statement of Fees before filing to determine if you will pay the Statement of Fees. I am available for a meet and confer. If I do not hear from you by the end of business tomorrow, Friday September 20th, the Letter Motion will be filed with the Court.

Laurence

Laurence Singer
Attorney-At-Law
voice: 646 327-8772
www.laurencesinger.com

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